

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-SRN-HB

Jamie Kreil,

Defendant.

DECLARATION OF ANNE M. LOCKNER IN SUPPORT OF
JAMIE KREIL'S MOTION FOR AN ORDER TO SHOW CAUSE

Pursuant to 28 U.S.C. § 1746, I, Anne M. Lockner, declare:

1. I am a partner at Robins Kaplan LLP, counsel for Defendant Jamie Kreil. I submit this declaration in support of Jamie Kreil's motion for an order to show cause.

2. I, along with my colleagues Ena Kovacevic, Haynes Hansen, and Charlie Gokey represent Jamie Kreil in this matter *pro bono*.

3. As of the filing of this declaration, the websites and videos at issue in Kreil's Motion for Sanctions, which the Court Ordered Brock Fredin to remove "immediately" on November 23, 2020, remain online.

4. Moreover, Fredin has created at least two additional videos and one additional website that clearly violate the Court's November 23, 2020 Order.

5. Fredin posted the new videos to his YouTube Channel, “Judicial Protest,” on December 1, 2020.

6. The first new video is directed at Kreil’s counsel, and falsely accuses counsel of discriminating against transgender individuals, states that the firm is “full of bigots,” and makes fabricated allegations that Kreil’s counsel denied a transgender employee medical leave for sex reassignment surgery.

7. The statements in the video are absolutely false.

8. Attached hereto as Exhibit A is a true and correct pdf image of the video currently hosted at <https://www.youtube.com/watch?v=ZI3faQ8g8MA>, and is titled “Robins Kaplan Discriminates Against Transwomen.”

9. The second new video is directed at the Court, and accuses Judge Nelson of refusing to represent black clients while in private practice, unfairness to black litigants as a judge, and similar accusations of bigotry. The video concludes by chiding the Court for threatening to detain Fredin if he failed to comply with the Court’s November 23, 2020 Order.

10. Fredin also posted a new website attacking Judge Nelson, which makes a variety of similar accusations and falsely claims Judge Nelson “bought her way to the top by bribing racist United States Senator Amy Klobachar.”

11. The undersigned believes the statements in the video and website to be false, and made solely in retaliation for the Court’s November 23, 2020 Order.

12. Attached hereto as Exhibit B is a true and correct pdf image of the video currently hosted at <https://www.youtube.com/watch?v=VyzUwT2wlss>, and is titled “Where Was Judge Susan Richard Nelson and Robins Kaplan When George Floyd Needed Them Most.”

13. Attached hereto as Exhibit C is a true and correct pdf image of the webpage found at susanrichardnelson.com.

14. Kreil will submit a thumb drive to the Court including the new videos referenced above as soon as is practicable, and asks that the Court use these copies of the videos rather than increase the search rankings of Fredin’s videos through repeated viewing.

I declare, under penalty of perjury, that the foregoing is true and correct.
Executed this 2nd day of December, 2020, in Minneapolis, MN.

By: s/*Anne M. Lockner*